

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

HAMAN, INC. d/b/a KNIGHTS INN,)	
)	
Plaintiff,)	
)	Civil Action File No.
)	<u>2:18-cv-1534-KOB</u>
v.)	
)	
CHUBB CUSTOM INSURANCE)	
COMPANY,)	
Defendant.)	

PLAINTIFF'S EXHIBIT LIST

N O T O F F E R E D	N U M B E R	I D E N T I F I E D	RULING ON OBJECTION (if any)			RULING ON REOFFER		R E C D. C O N D. O R L T D.	R E C E I V E D	<i>Haman, Inc. v. Chubb Custom Ins.</i> <i>2:18-CV-01534-KOB Trial Date: 7/19/2021</i> PLAINTIFF – Gary V. Conchin, Kenneth B. Cole, Jr. Gregory Brockwell, Jason Smith DEFENDANT – Wayne Taylor, Michelle Sherman David Lee, Mark Hess COURT – Honorable Karon Owen Bowdre EXHIBIT LIST OF PLAINTIFF
			SUS	O/R	RES	SUS	O/R			DESCRIPTION
	1									6/12/95 - Warranty Deed to Haman, Inc.
	2									Color picture before fire (all three buildings) (1 page)
	3 3A									2 aerial photographs showing building and lot dimensions
	4									Diagram of all three (3) buildings and rooms
	5									Pre-Fire Ballroom pictures (3 photos)
	6									WKFC Underwriting Manager's Inspection form
	7									Post-fire pictures (8 photos)
	8									Photo of fire scene (1 picture)
	9 9A									Chubb Custom Insurance Company Commercial Policy Appraisal Provision p. 9 policy
	10									4/15/14 - Perich – pictures

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			SUS	O/R	RES	SUS	O/R			DESCRIPTION
	11									4/15/14 - Lehman 20 pictures
	12									5/12/14 - Perich - Bushman pictures (pages 500-543)
	13									9/26/14 - Perich - Bushman pictures (pages 544-580)
	14									All pictures THG of the premises after the fire – (THG PX Bates 1-2264)
	15									Reduced summary of THG fire pictures (THG PX 1-81)
	16									Composite of current condition pictures
	17									Current premises photos
	17A									Video of premises condition - Billy Hunt
	18									5/13/ 14 - Email Perich
	19									5/14/14 - E-mail Perich to Horne (Belfor)
	20									5/14/14 – 6/6/14 – Perich correspondence

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			SUS	O/R	RES	SUS	O/R			DESCRIPTION
	21									5/13/14 - EDT Fortenberry - File Opening Form
	22									5/30/14 - EDT Fortenberry - Report (11 pages)
	23									5/30/14 - Evans Garment Restoration Invoice
	24									9/8/14 – Chubb’s Burrell email
	25									9/22/14 - Perich letter to Visram
	26									Undated York Services Hilliard to Jeremy Elliott
	27									9/22/14 – Letter Perich to Visram
	28									9/22/14 - Letter Perich to Visram
	29									10/1/14 -Email Perich to Elliott
	30									SEA Report “Haman Smoke Damage Comparisons (5 pages)

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			SUS	O/R	RES	SUS	O/R			DESCRIPTION
	31									10/14/14 – Jeremy Elliot to Hilliard re: Zarin
	32									12/23/14 and 12/29/14 -Perich to Zarin
	33									12/29/14 - Email Perich to Visram
	34									1/29/15 – Howarth (THG Client Information Sheet)
	34A									Redacted THG Appraisal Agreement
	35									1/29/15 – Complete Appraisal Employment Agreement THG
	36									2/11/15 - THG Report – (Fire loss 3/22/14)
	36A									THG Recap by Category – fire
	36B									Haman Structure Proof of Loss
	36C									6/2/21 – THG Updated Report (Fire loss 3/22/12)
	36D									6/2/21 – THG Recapy by Category- Fire
	37									2/9/15 - Zarin to Perich
	38									2/23/15 - Visram letter to Perich
	39									02/25/2015 Letter from Howarth to Perich
	40									Howarth - Curriculum Vitae

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			SUS	O/R	RES	SUS	O/R			DESCRIPTION
	41									3/23/15 – Email from Perich to John/Jeremy
	42									3/23/15 – Email from Howarth to Perich
	43									3/24/15 – Letter from Perich to Howarth
	44									3/25/15 Email from Howarth to Perich
	45									04/16/15 Email from Perich to Howarth
	46									4/16/15 -Email Perich to Bushman
	47									04/17/15 -Email Howarth to Perich
	48									04/17/15 Email from Perich to Howarth
	49									Ala. Ins. Appraisal
	50									4/17/2015 - YA Admin (Young) to Bushman, Lehman

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			SUS	O/R	RES	SUS	O/R			DESCRIPTION
	51									4/16/15 – Perich to Bushman
	51A									Belfor – THG Comparison Young & Associates
	52									5/7/15 – File Note re: scope visit
	53									5/11/15 – Email Perich re: admits expansion joint issue
	54									5/12/15 – File Note Koos to Perich re: increasing scope
	55									5/13/15 -Bushman appraisal for Perich, Chubb (\$523,477.01)
	56									5/16/15 -Valuation reports – 5/6/15
	57									(Undated) File Note Perich to Jeremy/Hilliard
	58									5/20/15 -Email Lehman to Bushman
	59									6/1/15 -Email Perich to Grandinetti and Howarth
	60									7/17/15 -Email Howarth to Perich

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			SUS	O/R	RES	SUS	O/R			DESCRIPTION
	61									7/17/15 – File note to Koos
	62									7/20/15 – File note Koos
	63									7/22/15 Email from Perich to Bushman
	64									7/22/15 – Email from Bushman to Perich
	65									7/22/15 - Perich to Howarth
	66									7/23/15 - Howarth to Perich
	66A									7/25/15 - Bushman named appraiser
	67									THG proposed three (3) umpires (2 pages)
	68									Dale Mullin curriculum vitae
	69									8/7/15 -Email Howarth to Bushman
	69A									8/17/15 – Perich to Bushman
	70									7/29/15 – Email Perich to Howarth

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			SUS	O/R	RES	SUS	O/R			DESCRIPTION
	71									08/20/2015 Email
	72									Handwritten note Sarah Grandinetti
	73									8/7/15 -Visram letter to Perich
	74									Sarah Grandinetti – fire contents inventory
										Sarah Grandinetti – fire contents inventory (\$139,451.32)
	74A									Haman Proof of Loss contents
	75									Sarah Grandinetti CV
	76									Arthur Grandinetti – CV
	77									8/10/15 –FBS Expert Report (18 pages)
	78									FBS Irmiter - Curriculum vitae (19 pages)
	79									FBS Irmiter – fire pictures – (IRM PX Bates 1-128)
	80									FBS Irmiter – picture of Black Mold-stachybotrys

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			SUS	O/R	RES	SUS	O/R			DESCRIPTION
	81									FBS Irmiter – picture of Chaetomium
	82									FBS Irmiter – picture of Aspergillus and Penicillium
	83									8/20/15 Email Perich to Bushman
	84									8/21/2015 – Email Howarth to Bushman
	85									8/21/15 – Declaration of Appraisers
	86									8/21/15 and 8/25/15 – Declaration of Appraisers
	87									9/3/15 – Email Perich to Zarin
	88									9/10/15 – Zarin Visram letter to Perich
	89									Resend of 9/10/15 Zarin letter to Perich
	90									10/1/15 – Email Howarth to Bushman

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			SUS	O/R	RES	SUS	O/R			DESCRIPTION
	91									10/21/15 – Email Howarth to Perich
	92									10/21/15 – Email Perich to Howarth
	93									10/22/15- Email Perich to Bushman
	94									10/22/15 – Email Perich to Bushman re: new, old contents claim
	95									Allen Contents List
	96									10/26/15 – Email Perich to Bushman
	97									11/13/15 – Paden & Paden
	97A									DANGER KEEP OUT SIGN
	98									12/1/15 – Email Wade Bushman to Perich
	99									12/4/15 - Email Perich to Wade Bushman,
	100									12/18/15 – Reservation of Rights

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			SUS	O/R	RES	SUS	O/R			DESCRIPTION
	101									York Payment Ledger
	102									12/18/15 – Letter Koos to Perich re: EUO and ROR – (2 pages)
	103									Claims File – Notes
	104									Perich First Report – April 16, 2014
	105									Perich Second Report – May 23, 2014
	106									Perich Third Report – July 21, 2014
	107									Perich Fourth Report – September 2, 2014
	108									Perich Fifth Report – October 19, 2014
	109									Perich Sixth Report - November 26, 2014
	110									Perich Seventh Report – December 26, 2014

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			SUS	O/R	RES	SUS	O/R			
										DESCRIPTION
	111									Perich Eighth Report – January 30, 2015
	112									Perich Ninth Report – March 9, 2015
	113									Perich Tenth Report – April 25, 2015
	114									Perich Eleventh Report – June 4, 2015
	115									Perich Twelfth Report – July 17, 2015
	116									Perich Thirteenth Report – August 21, 2015
	117									Perich Fourteenth Report – October 2, 2015
	118									Perich Fifteenth Report- November 19, 2015
	119									1/10/16 Email Perich to Wade Bushman
	120									1/11/16 -Email Howarth to Perich

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			SUS	O/R	RES	SUS	O/R			DESCRIPTION
	121									1/11/16 -Butler Law Firm letter to Zarin
	122									1/11/16 - Bushman to Howarth
	123									1/12/2016 - Email Perich, Wade Bushman and Koos
	124									1/19/16 - Butler Law Firm letter to Zarin
	125									1/20/16 - Email Perich to Wade Bushman
	126									1/20/16 -Email Perich to Wade Bushman and Koos
	127									1/25/16 – Koos to Perich
	128									1/27/16 Perich to Bushman
	128A									1/30/16 Letter Bushman to Howarth
	129									7/5/16 - Bushman to Luke Bowman
	130									6/6/20 - Demolition estimate RC Enterprises \$457,500.00

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	131									6/29/20 Demolition estimate Taco Stephens (\$443,500.00)
	132									6/23/20 Demolition estimate Wise Excavation (\$448,476.97)
	133									Wilburn p. 643, 644 (2 pages) - “Alabama”
	134									Picture of Bushman
	135									Picture of Perich
	136									Howarth e-mails re: delays
	137									Summary of Expert Witness fees as of 8/14/20
	138									Partial Proof of Loss - Building
	139									Partial Proof of Loss - BPP Contents
	140									Fortenberry bills 5-30-2014 and 10/8/2015 (\$2,769.23 and \$5,709.55)

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			SUS	O/R	RES	SUS	O/R			DESCRIPTION
	141									Wade Bushman billing 6/15/15-11/24/15 (\$25,520.15)
	142									Steve Lehman billing – 6/12/15 – 1/13/16 (\$13,542.00)
	143									Brent Perich billing – 9/28/14 – 9/20/16 (\$19,850.11)
	144									Thomas Sumner billing – 12/8/15 – 2/16/16 (\$22,613.91)
	145									Stuart Mintz billing – 2/17/16 (\$3,987.05)
	146									Paul Defay billing - 10/31/14 (\$4,176.88)
	147									Chubb, York Risk Services, Young & Associates diagram
	148									BBMK estimate 5-20-14
	149									Belfor estimate 5-30-14
	150									Brookstone estimate 7-14-14

Respectfully submitted this the 21st day of June, 2021.

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CERTIFICATE OF SERVICE

I certify that I have on the 21st day of June, 2021 served a true and correct copy of the foregoing to counsel for all parties in this matter via electronic mail using the federal online filing system for this District.

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